

FORT SUMTER NATIONAL MONUMENT

COMMERCIAL SERVICES PLAN



September 2000



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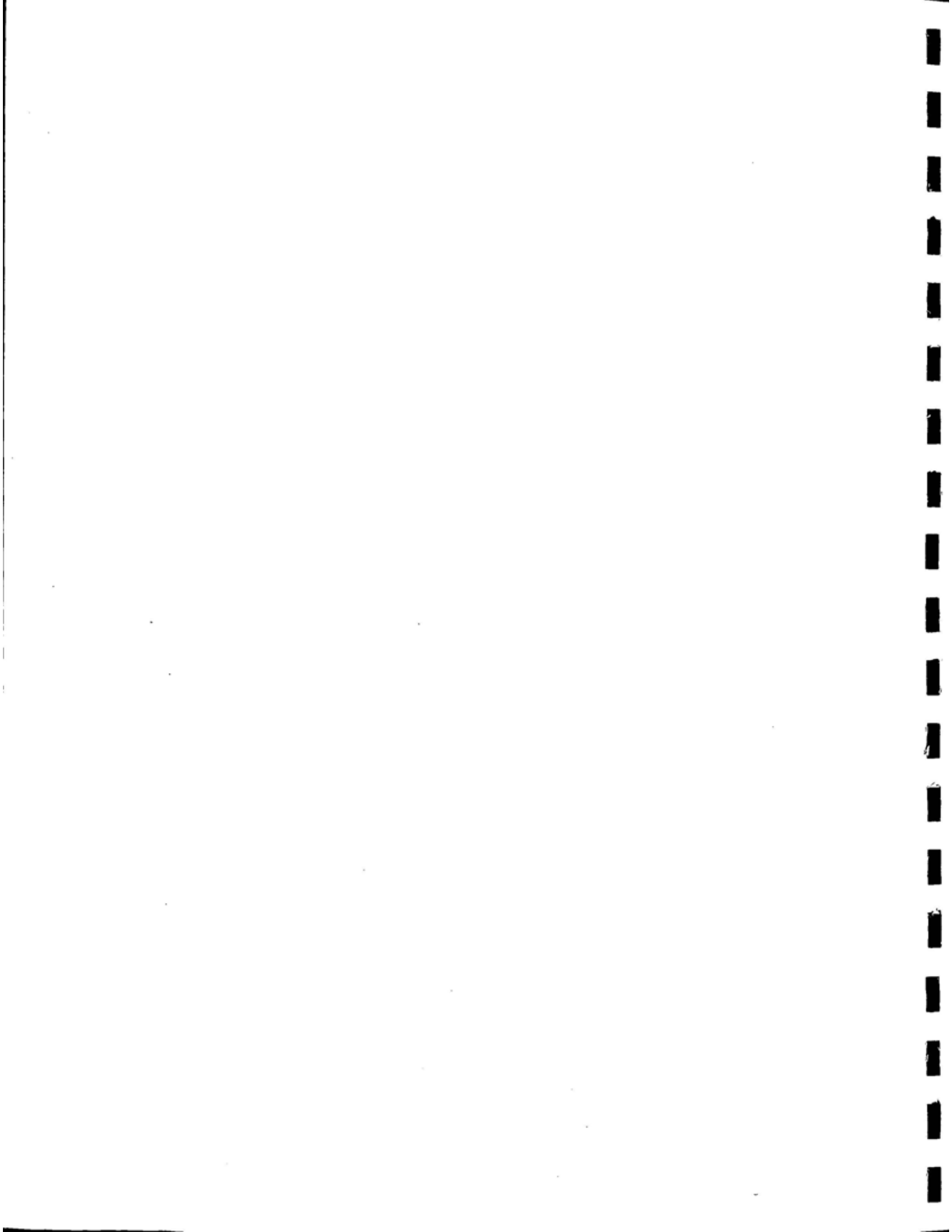


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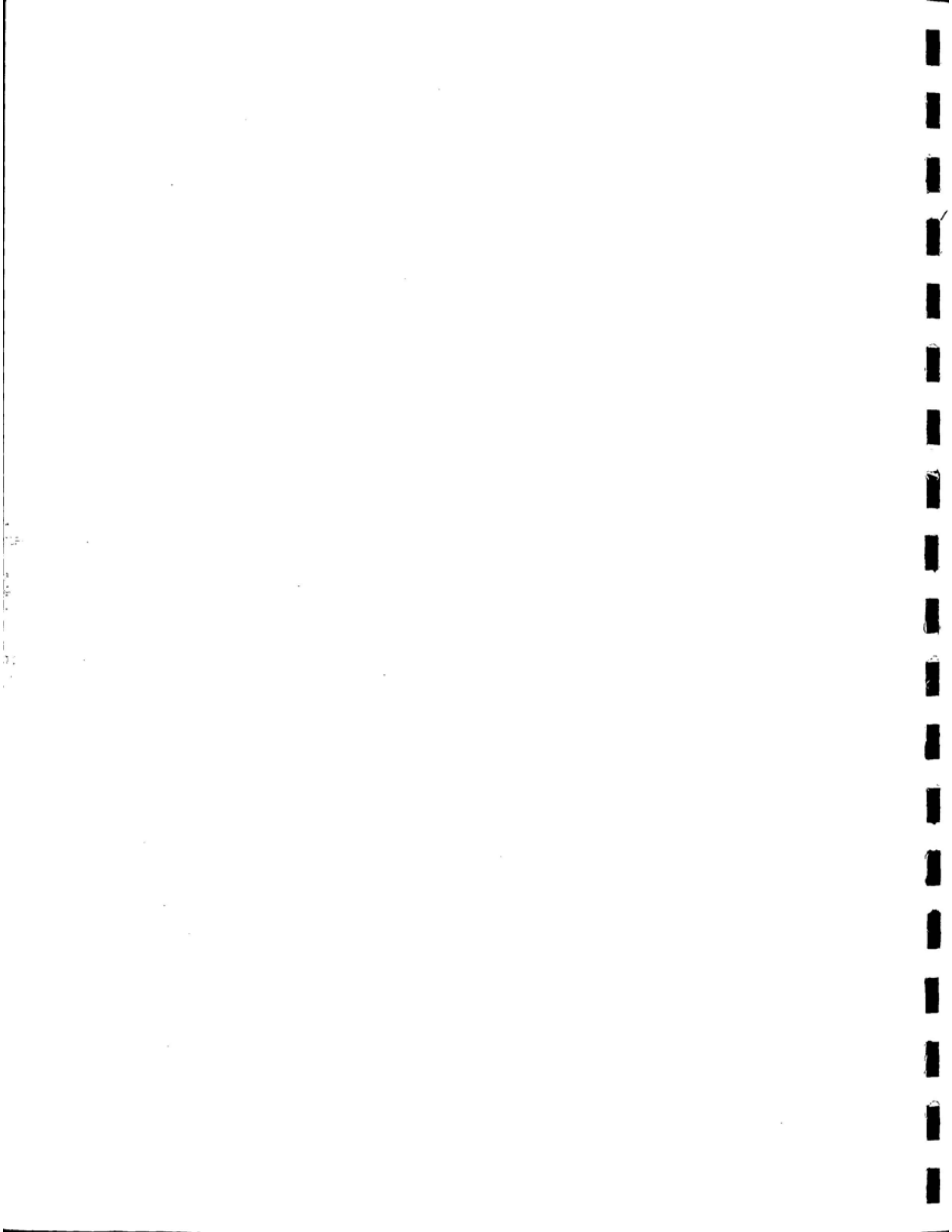
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SUMMARY

The National Park Service (NPS) completed the assessment of the commercial services program at Fort Sumter National Monument during fiscal year 2000. The public was invited to comment from November 1999 until February 15, 2000. In July 2000 two surveys were administered to Fort Sumter visitors and one to South Carolina Aquarium visitors to determine the impact the new location may have on visitor patterns. The results of this survey as they affect this plan are included in Appendix C. This document is the product of public comment and park management consideration and review of all existing and potential commercial services at the park. It should serve the park for the next 10 years.

Fort Sumter National Monument is comprised of four units — Fort Sumter, Fort Moultrie, the Historic Coast Guard Station on Sullivan's Island, and the new boat dock facility located in downtown Charleston. The primary objective of the park is to preserve, protect, and interpret the related historic resources for the enjoyment of the visiting public.

On November 7, 1986, Public Law 99-637 authorized the Secretary to acquire an 8.91-acre site along the Cooper River at the foot of Calhoun Street for the development of a tour boat facility. The legislation calls for cooperation with the City of Charleston to lease a portion of NPS land for construction of the South Carolina Aquarium. The park is in the process of constructing a new boat dock facility in downtown Charleston that will be the new base of operations for tour boat service to Fort Sumter. Collocated on the NPS tract is the South Carolina Aquarium that opened May 19, 2000. That portion of the NPS landscaped area in front of the Aquarium known as Liberty Square opened in May as well.

The tour boat facility at Liberty Square is currently expected to be operational in August 2001. The new concession contract for tour boat service will be issued in late spring 2001. The new concession contract will commence operation in August 2001. An interim contract may be issued for services between January 2, 2001 and the start date of the new contract. This plan has been determined to meet the goals and needs of the park during the interim period and the next contract. The plan strategy is to focus on appropriate commercial services that best achieve park goals.

The tour boats will operate year-round from Liberty Square once the new facility opens. The National Park Service is considering a second concession contract to provide a ferry from a location in Mount Pleasant to the NPS dock at the Liberty Square. The purpose of this ferry is to provide direct access from Mt. Pleasant to the Fort Sumter dock at Liberty Square. Other public ferry systems will not be allowed to dock at the Liberty Square facility unless it is associated with the visitor management goals of the park. A change in the current Corps of Engineer permit will be required to allow this activity.

The effective capacity of the fort, based on a statistical survey for providing a high quality visitor experience, is 385 visitors at one time. The park has been unable to staff the fort at that level and relies on volunteers to accommodate the visitors needs. Additionally, the need to identify a fort carrying capacity based on resource preservation has been recognized and is underway.

The Commercial Services Plan does not anticipate the need for any additional food or beverage service at Liberty Square and Fort Sumter under the concession contract. No merchandise sales area will be provided at the fort or Liberty Square. Eastern National, a cooperating association will provide a year round sales area in the tour boat facility to support the park interpretive programming. A concession operated ticket booth for passage to Fort Sumter will be available. No other commercial services or advertising for other private commercial activities will be allowed on the dock or inside the facility except those directly associated with the park's visitor use management goals.

The 1916 Organic Act for the National Park Service and legislation specific to Fort Sumter National Monument provide specific legal guidance for park management. In addition, the National Park Service Concessions Management Act of 1998 provides specific guidance on how the park commercial services program is to be managed. Concession contracts and Commercial Use Authorizations are the primary tools used in this concession management effort. The Commercial Services Plan (CSP) is an implementation plan receiving its direction from plans such as the General Management Plan (GMP) and Strategic Plan. Approved in 1998, the GMP for Fort Sumter NM is very recent and timely to park issues. It provides specific direction for commercial services.

PURPOSE AND NEED FOR THE PLAN

The Commercial Services Plan provides a mechanism for establishing the types and levels of commercial activities necessary and/or appropriate for Fort Sumter National Monument (FOSU), and the most effective and efficient method for the National Park Service (NPS) to manage those activities. This plan provides a comprehensive guide for managing commercial services at FOSU. Commercial activities in the park managed by the implementation of this plan include the park concessions and other commercial activities operating under various written authorizations issued by the NPS.

The *National Park Service Concessions Management Improvement Act of 1998* mandates that concession development and services at Fort Sumter, and all NPS units, be necessary and/or appropriate to the park in which they are located. This plan determines which activities are necessary and/or appropriate. The 1998 GMP called for a review of existing park commercial activities. This plan fulfills that requirement and provides the details necessary to implement a commercial services program in the park. The GMP also states that the tour boat will continue to operate as a concession from the Tour Boat Facility thus establishing that this commercial activity is necessary for the park to achieve its long term goals.

The existing concession contract expires December 31, 2000. This plan ensures that the next contract issued for the tour boat operation and any other appropriate business activities meet applicable Federal, state, and local laws and regulations, such as the Americans with Disabilities Act (ADA) and US Coast Guard regulations. In addition, all commercial activities will operate in a manner that is consistent with the mission of FOSU. The mission is that all commercial activities operating within the park should provide high quality visitor experiences while protecting important natural, cultural, and scenic resources.

Nearly all visitors to Fort Sumter arrive via the commercial ferryboat and many arrive at Fort Moultrie via commercial tour buses. Increasing use levels have resulted in increased resource impacts and diminished visitor experiences in the park. Increased numbers of visitors, a portion of which are the result of commercial promotion and advertising can strain facilities, destroy cultural resources and result in a lower quality visitor experience. The plan addresses these concerns to mitigate further damage.

PARK SETTING

DESCRIPTION OF THE PARK

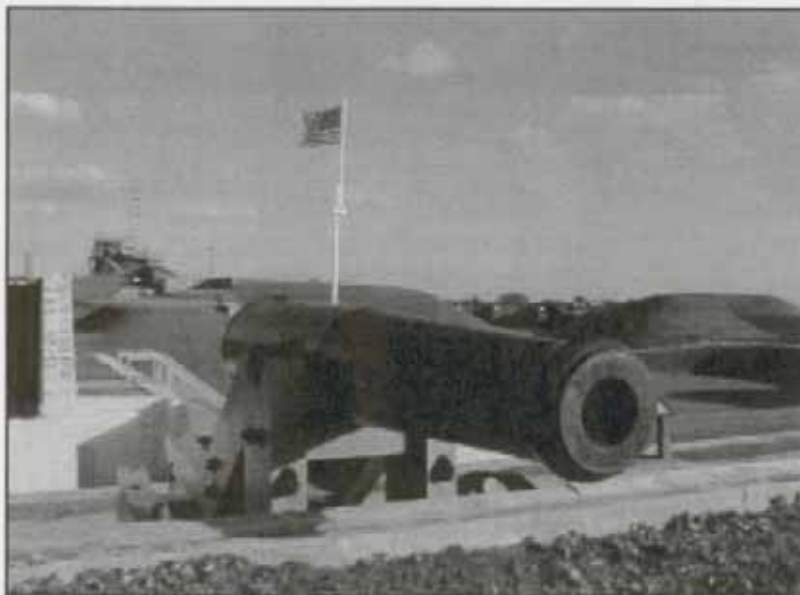
Fort Sumter is located in Charleston County in the harbor of Charleston, South Carolina (see Vicinity Map). It consists of four geographically separate areas:

- 1) Fort Sumter, an island fort situated at the entrance of Charleston Harbor;
- 2) Fort Moultrie, located one mile northeast of Fort Sumter on the southern part of Sullivan's Island;
- 3) the Historic Coast Guard Life Saving Station containing the park's maintenance and seasonal housing facility located .8 mile east of Fort Moultrie; and
- 4) Liberty Square, the tour boat facility site now under development in Charleston (see location map).

Fort Sumter sits on a man-made island of 2.4 acres near the inlet of Charleston Harbor about 3.3 miles southeast of the City of Charleston. The park boundary includes 122.5 acres of submerged land surrounding the island. Fort Sumter construction began in 1829 as part of a coastal defense program initiated after the War of 1812. It was a five-sided, three-tiered masonry structure towering nearly 50 feet above the water. It was designed for armament of 135 guns and a garrison of 650 men. On December 26, 1860 it was occupied by Union forces, which quickly became the focus of political and military events which resulted in the opening bombardment of the Civil War, April 12-13, 1861. From April of 1861, it was occupied throughout most of the Civil War by Confederate forces and bombarded heavily until Union forces reoccupied the fort on February 18, 1865. After the war, some improvements and cleanup were performed but the fort stood virtually neglected until 1898 when a more modern, concrete emplacement, Battery Huger, was constructed in what was the parade ground of the original fort. During World War II coastal defenses were deemed to no longer be effective. The fort was transferred from the War Department to the Park Service in 1948. The National Park Service manages the fort as a preserved ruin and has made only minor improvements to provide access, restroom, exhibit facility, and power and water systems. The primary interpretive themes for Fort Sumter is the opening of the Civil War and the long sieges that followed in 1863-65. Secondary themes include the social and economic factors that separated the United States.



Fort Moultrie is situated on the southern tip of Sullivan's Island, about a mile north of Fort Sumter across the Charleston channel. It is the site of the first major American naval victory in the Revolutionary War and is representative of over 170 years of American coastal defense. The fort encompasses 59.28 acres including a 30-acre scenic easement with the Town of Sullivan's Island. Most of the existing structures were built between 1809 and 1945. The original Revolutionary War fort site is within the boundary but there are no physical remains above ground. Fort Moultrie had been an active fort in the coastal defense system during all American military conflicts through World War II. The State of South Carolina owned the site from 1948 to 1960. In 1960, the National Park Service accepted jurisdiction of the historic fort under authority of the Historic Sites Act of 1935. The primary interpretive theme of Fort Moultrie is the history of American coastal defenses, which are well represented with existing cultural resources. Across the road from the fort is park headquarters, located in the 1902 Torpedo Storage building, and the 1976 visitor center. The park dock is located in Sullivan's Island Cove adjacent to the Intercoastal Waterway north of park headquarters. The dock provides a departure point for ranger and maintenance staff to access Fort Sumter. Additionally, the Fort Moultrie dock is available for limited personal visitor use.



The **Coast Guard Station** is about a mile north of Fort Moultrie. It was leased by the Park Service beginning in 1971 and acquired in 1990. The site is 1.22 acre with no public facilities. The park uses the historic life saving facility for housing and the other buildings for maintenance purposes. No visitor services or exhibits are planned for this site.



The **Ferry Boat Facility and Liberty Square** are located in Charleston along the Cooper River at the foot of Calhoun Street. The Secretary of Interior was authorized to acquire the 8.91-acre site on November 7, 1986 for the development of the ferry boat facility by Public Law 99-637. The legislation calls for cooperation with the City of Charleston to lease a portion of NPS land for construction of the South Carolina Aquarium. The ferry boat facility is expected to be operational in the summer of 2001. The ferry boat facility will house minimal exhibits and waysides to orient visitors to Fort Sumter National Monument. Major interpretive themes will center on Fort Sumter and the events that led to the Civil War.



THE VISITOR EXPERIENCE

Working within the framework that established the purpose and significance of the park, the General Management Plan (GMP) describes the desired visitor experience. All activities, including commercial, should strive to achieve these desired future conditions.

Fort Sumter & Liberty Square Ferry Boat Facility

Visiting Fort Sumter is more than just taking a ride on a ferryboat. It is an event often planned for many years and remains a highlight of the visit to Charleston. Visitors find adequate signing and parking from the highway. As they are directed to their destinations (NPS ferry boat facility, SC Aquarium and/or private businesses), the transition between parking, walking, and arrival is orderly, safe and pleasant. The site is landscaped and visitors enjoy their leisure among the natural elements. The NPS has a strong visual presence and access to the ferry boat facility is clearly marked.

At the new dock facility, the visitor walks through Liberty Square either from the parking garage on Calhoun Street or from the maritime center. He or she will experience a transitional environment in Liberty Square that provides relief from the strains everyday life brings in the 21st century visitor. The park will be a place to contemplate the liberties we share in America and those of many cultures who have contributed to the preservation of that liberty.

The visitor will easily enter the ferry departure building via steps, elevator, or ramp to find a series of exhibits about the importance of Fort Sumter and the Nation's heritage emanating from the Civil War. Exhibits highlighting America's search for shared liberties from the Constitution to 1861 will place the Civil War in context for the visitor. When staffing is available, NPS Rangers will depart with visitors aboard the ferry to Fort Sumter. On the ferry boat visitors are introduced to the compelling story while en route to Fort Sumter, and have an opportunity for dialog with park staff. They have a pleasant boating experience and enjoy harbor viewsheds similar to those of the 19th century. The harbor views and waters are aesthetically pleasing and visitors are motivated to participate in protection of these resources.

Visitors are inspired by the significance of the site, understanding that they are on hallowed ground and that there is only one Fort Sumter. The compelling story for Fort Sumter is told through contemporary interpretive means. Exhibits convey the compelling story to a diverse audience and reflect current exhibit standards. They can walk through and around portions of the fort remnants not closed for safety or administrative reasons. The site is not overcrowded and visitors have time to enjoy the resource. They are greeted by NPS personnel and have an opportunity for dialog with park staff. They can record their experiences, their personal needs are met and their safety is ensured. Full accessibility to major historic features, viewpoints and interpretive exhibits is available where feasible. Visitors to the park are motivated to participate in resource protection.

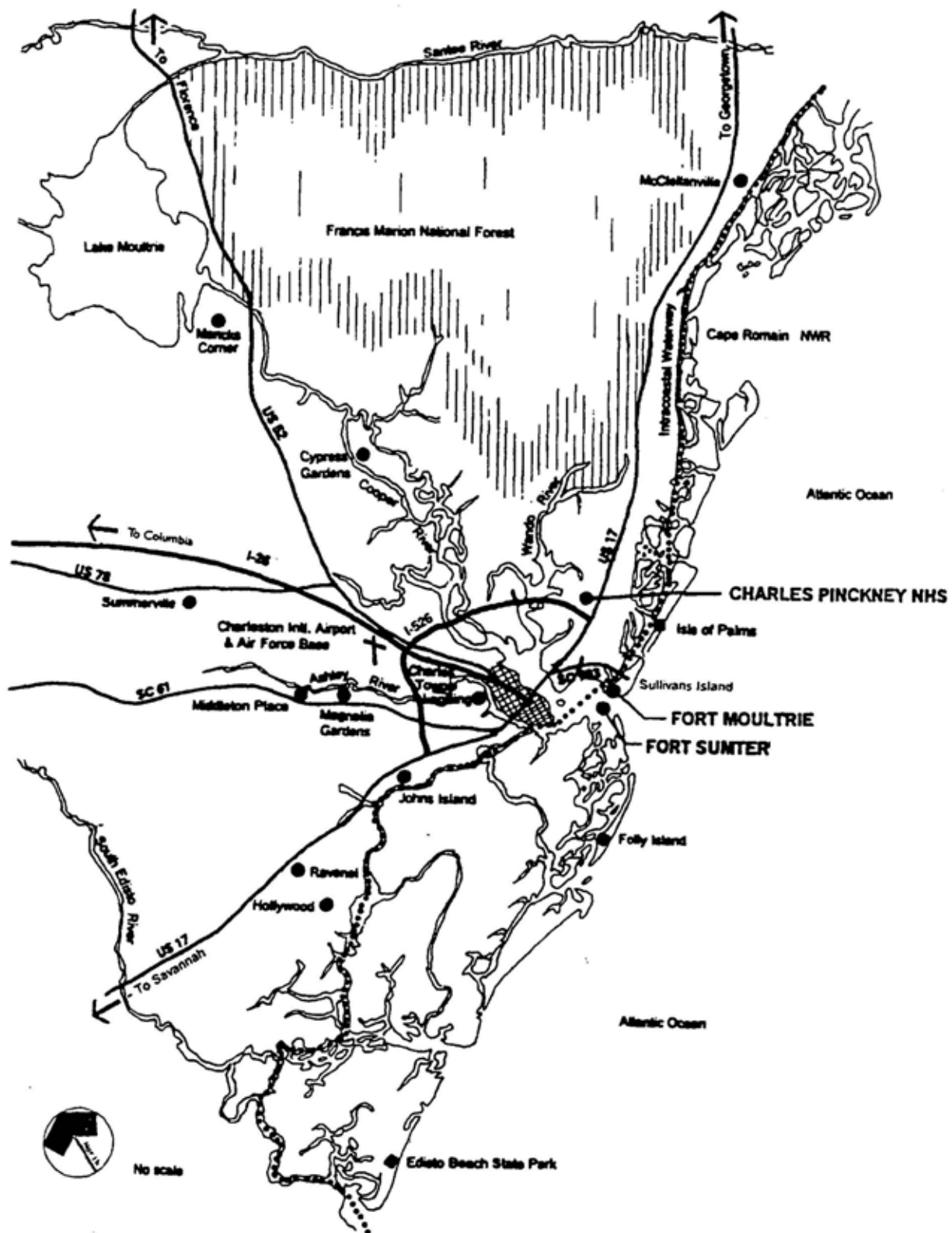
Visiting at Fort Moultrie

A typical visit to Fort Moultrie would see the visitor arriving via land either by car or bus. Upon entering the Visitor Center parking area, the visitor sees an informational wayside exhibit that explains the daily program at the site as well as provides information about Charles Pinckney National Historic Site and Fort Sumter National Monument. Upon entering the visitor center, the visitor will see a large map of Charleston Harbor as well as four exhibit islands of Fort Moultrie history. Upon viewing the new exhibits and the movie, the visitor crosses Middle Street to historic Fort Moultrie where the fort has been restored to six separate time periods.

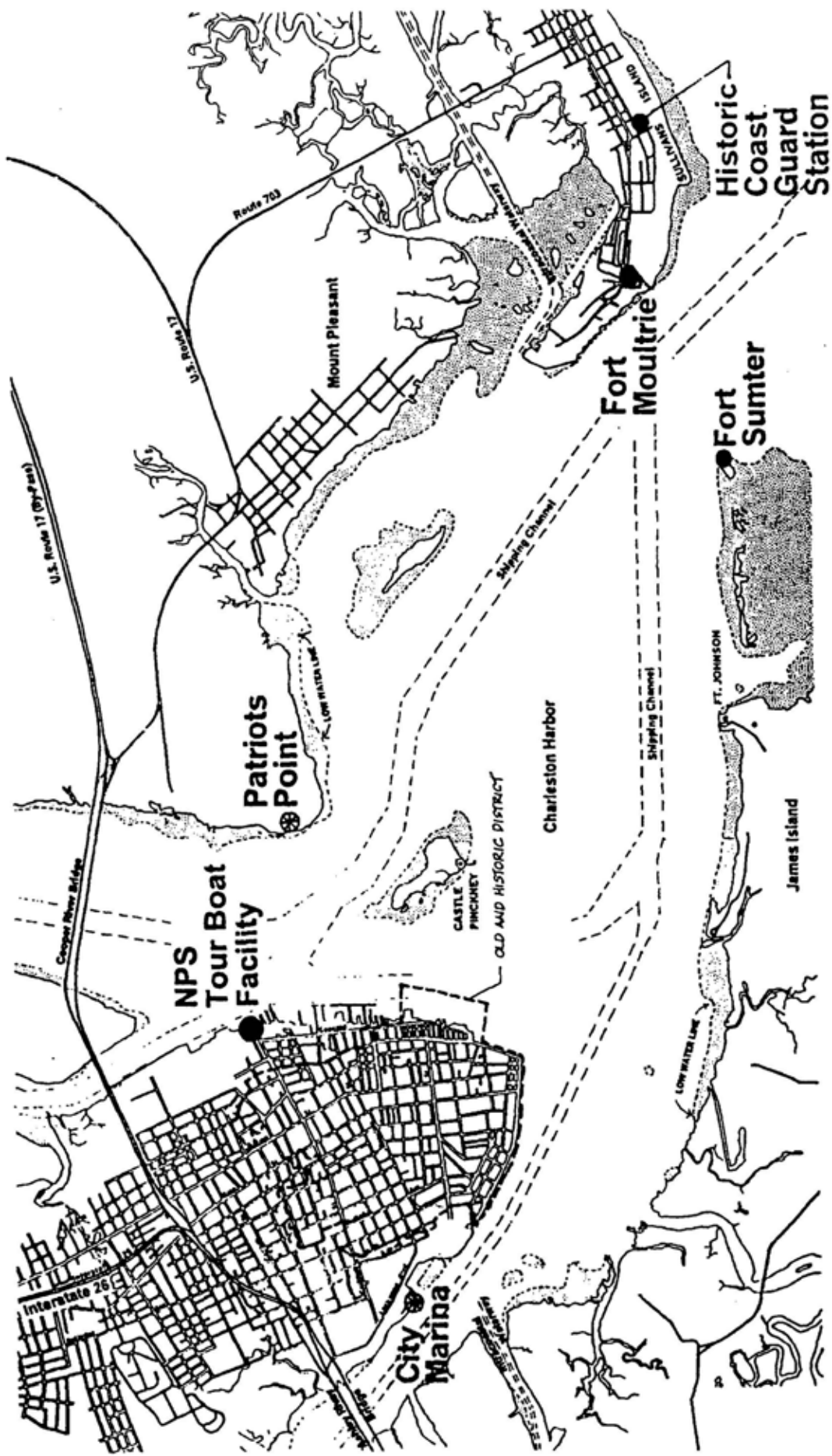
Visitors are inspired by the significance of the site and understand Fort Moultrie's role in the Revolutionary War as well as in the Civil War and World Wars. They receive and understand the compelling story for Fort Moultrie. The fort is interpreted as an outdoor museum reflecting five periods of military history. Visitors can tour the fort and associated structures and have an opportunity for dialog with park staff. The fort is not overcrowded and visitors have time to enjoy the resource. Outdoor interpretive exhibits convey the compelling story to a diverse audience, are well maintained and reflect current exhibit standards. The story of the Endicott era batteries is effectively communicated through interpretation of Battery Jasper's Gun Position #1. Visitors can record their experiences, and their safety is ensured. Beach access is allowed and emergency access still occurs, as needed, both without adverse impact to resource and visitor experience.

Full accessibility to major historic features, viewpoints and interpretive exhibits is available where feasible. Visitors to the park are motivated to participate in resource protection.

Visiting America's treasures is the primary mission of the National Park Service. The preservation and enjoyment of these sites is more important than their ability to generate revenues for the National Park Service. The goals and objectives of this plan are to provide the best visitor experience possible while preserving the cultural remains.



VICINITY MAP CHARLESTON, SOUTH CAROLINA



PARK MISSION, PURPOSE AND SIGNIFICANCE

The FOSU *mission statement* is based on park legislation and the 1998 Strategic Management Plan, which was required of all federal government agencies by the Government Performance and Results Act.

Fort Sumter National Monument commemorates defining moments in American history within a military continuum spanning more than a century and a half. Two seacoast fortifications preserve and interpret these stories. At Fort Moultrie, the first American naval victory over the British in 1776 galvanized the patriot's cause for independence. Less than a century later, America's most tragic conflict ignited with the first shots of the Civil War at Fort Sumter.

The Fort Sumter *mission goals* are a set of statements that describe the desired resource conditions and visitor experiences that, taken together, fully achieve the park's purpose, maintain its significance, and meet its mandates.

- Masonry structures and associated values and artifacts relative to the park's stated purpose are preserved and managed within the Charleston Harbor and military history context.
- FOSU contributes to the knowledge of cultural resources and associated values, and bases management decisions on scholarly and scientific information.
- At Fort Sumter, Fort Moultrie, and the tour boat facility, visitors safely enjoy and are satisfied with the availability, accessibility, diversity, and quality of facilities, services, and appropriate recreational opportunities.
- Park visitors and the general public understand and appreciate the purpose and significance of Fort Sumter and Fort Moultrie.
- FOSU uses best management practices, systems, and technology to accomplish its mission.
- FOSU increases its managerial capabilities through initiatives and support from other agencies, organizations, and individuals.

The *purpose* of FOSU is derived from the park's enabling legislation and explains why the park exists.

Fort Sumter

- To preserve the Civil War remnants of Fort Sumter.
- To commemorate and interpret the opening battle of the Civil War and Fort Sumter's role during the Civil War.

Fort Moultrie

- To preserve existing historic military structures and artifacts, both above and below the ground, in order to illustrate the evolution of U.S. coastal defense.
- To interpret the evolution of U.S. coastal defense with emphasis on the battle of Sullivan's Island and the Fort's role during the Civil War.

The *significance* of FOSU is derived from identifying the park's exceptional resources and values that must be preserved to accomplish the park purpose.

Fort Sumter

- Fort Sumter is where one of our Nation's most critical defining moments, the American Civil War, began.
- Fort Sumter is the most heavily bombarded site in the Western Hemisphere as a result of the Union forces attempt to gain control of Charleston Harbor.
- Fort Sumter was and is a powerful symbol to both the North and the South, and it remains a memorial to all who fought to hold it.

Fort Moultrie

- Fort Moultrie is the site of the first patriot victory over the British navy in the Revolutionary War and contributed to British reluctance to invade the South.
- Fort Moultrie served as the Charleston operational headquarters of the Confederate Army during the opening battle of the Civil War and the siege of Charleston.
- Fort Moultrie is the only NPS site that preserves elements of each significant period of American seacoast defense from 1776 to 1947.

COMMERCIAL SERVICES PROGRAM

GUIDING LAWS AND POLICIES

All activities at FOSU are governed by the 1916 Organic Act that created the National Park Service and congressional and presidential authorizing actions taken specifically for the park. These can be found in the 1998 GMP. In addition, there are several laws and policies that deal directly with commercial activities in parks.

The Omnibus Park Management Act of 1998 was passed by Congress and signed into law November 13, 1998. The National Park Service Concessions Management Improvement Act of 1998 is the short title for section IV of the Omnibus Act of 1965, which deals directly with NPS concessions. This legislation supersedes the Concessions Policy Act that guided NPS concession management for the last 30 years. The National Park Service has rewritten regulations to implement the new law. This process involves reviews by other government agencies and the public, which may cause delays for implementation. In the meantime, the National Park Service will move forward to manage commercial services recognizing the transition between laws. Regardless, commercial services will be managed at FOSU in such a way as to fulfill the park's mission.

The new legislation incorporates much of the philosophy of the old law including development shall be limited to those accommodations, facilities, and services that are necessary and appropriate for public use and enjoyment of the unit of the National Park System in which they are located and are consistent to the highest practicable degree with the preservation and conservation of the resources and values of the unit. In addition, the Secretary of the Interior should exercise his authority in a manner consistent with a reasonable opportunity for the concessioner to realize a profit. Thus, only economically feasible concession operations should be introduced.

The new law makes some significant changes. Large (over \$500,000 annual revenues) concessioners are no longer given a right of preference in renewal of contracts except for outfitters and guides. The term of new contracts will normally be 5 to 10 years, with 20-year contracts only issued in special financial situations with approval from the Director. Concession permits will be discontinued and two simplified standard contracts, Category II and Category III will be used instead. Possessor interest has been changed to Leasehold Surrender Interest and redefined. Under the old law, all franchise fees paid by a concessioner were sent to the general treasury. Under the new law, all franchise fees stay with the NPS to be used for concession related or resource protection projects. The park that collects the fees retains 80% and the remaining 20% are used servicewide.

Another important provision of the new law is the management of Incidental Business Permits/Commercial Use Authorizations. (Definitions of these instruments are listed in Appendix B). Incidental Business Permits are from the old law and Commercial Use Authorizations are from the new law. The primary issue with Incidental Business Permits was the relative inability to limit the amount of activity since limits could not be placed on the number of permits issued. The new law addresses this issue and the Park Service is trying to implement the solution through the regulation development process.

According to *National Park Service Management Policies*, most commercial activities in parks operate under contracts or permits. Commercial activities are conducted under safeguards that protect against unregulated and indiscriminate use and ensure that heavy visitation does not impair park values and resources. Concessions in park units should be viewed as a management tool to be used, when necessary and appropriate, to achieve the objectives of the park unit. Historically, the concessions program has been based on considerations such as visitor needs, the agency's ability to satisfy those needs, the resource itself, and the apparent carrying capacity. Changing conditions and increasing pressure to meet visitor needs requires a strategy that balances visitor needs with the purposes and values of individual parks.

The National Park Service guidelines that are applicable to commercial services include:

- NPS-48 Concessions Guidelines
- NPS-50 Loss Control Management Program Guideline
- NPS-53 Special Park Use
- NPS-83 Public Health Management Guideline

These guidelines, along with fundamental policies, standard contract language, and operating practices, are used in managing commercial activities throughout the national park system.

COMMERCIAL SERVICES AUTHORIZATION INSTRUMENTS

As stated in the previous section, the authorizing instruments established under the new law cannot be implemented until new regulations are written, reviewed, and approved. When that happens concession contracts, long and short form and commercial use authorizations will replace concession permits and IBPs. During the interim existing concession contracts and permits can be extended for up to three years, and/or a sole source contract can be issued for up to three years, for a total of up to six years and IBPs will continue to be issued on a year to year basis. The following describes the authorization instruments currently available to the Park Service. It would be presumptuous to try to describe the new authorizing instruments in any detail until the regulations are written to define them.

Concession Contracts

Concession contracts are legal agreements between the Secretary of the Interior (or authorized delegate) and a concessioner that requires the concessioner to provide certain visitor accommodations, facilities, or services. Concession contracts are used for large complex operations and are issued by competitive bid. The term for an existing contract issued prior to the new law can be for as long as 30 years and up to 20 years under the new law.

All concession operations must be approved and authorized by the National Park Service under delegation of authority through the preparation of a prospectus (solicitation of offers), NPS review of proposals, selection of the best offer, and final contract execution. The procedures are detailed in 36 CFR, 51.4.

Under the terms and conditions of a concession contract, the Secretary has the authority to assign land and government improvements (facilities) to the concessioner as appropriate and necessary for conduct of operations. The contract requires the concessioner to fulfill specific obligations as defined in the contract.

Concession contracts contain an operations plan, a maintenance plan, and, in many instances, a building improvement plan. They require care of land and government improvements provided by the National Park Service to the concessioner. Compliance with the plans is mandatory. Financial functions associated with issuing and managing concession contracts include feasibility studies and ensuring a fair return to the government. General standards are set for calculation of financial returns to the United States and affirms that revenue production is subordinate to resource protection and visitor services.

Under the new law several changes will occur to contracts. The preferential right to renewal will be phased out and the term of contracts will be 5 to 10 years (up to 20 years if unusual financial circumstances exist but only with approval from the Director). The park collecting the fees from the contract will keep 80% but special accounts will be phased out. Possessory interest will be replaced with leasehold surrender interest, the details of which still need to be worked out. Most other elements of a concession contract will not change.

Concession Permits

Concession permits were used when the authorized concessions operations were not expected to gross more than \$100,000 annually. The term of the permit was for five years or less, and no possessory interest or preferential right to additional services was granted. The concessions permit, issued by competitive bid, was used for operations that were smaller and less complex than those permitted under concession contracts.

Concession permits authorized temporary construction and assigned government-owned facilities and land to a concessioner. The National Park Service collected fees from permit holders based on the probable value of the business opportunity. Permit holders did not have possessory interest or any other right of compensation.

Under the new law concession permits will be eliminated and replaced with a short form concession contract. The intent to deal with small revenue operations in a more efficient manner will continue. Elements of a contract will apply such as land and facility assignments, leasehold surrender interest, fee determination, and term lengths.

Incidental Business Permits/Commercial Use Authorizations

Incidental Business Permits were not issued to concessions. The permits were used as a mechanism to authorize external commercial entities such as guide services, motorcoach tours, and recreational tours to use the park as part of their businesses. Services begin and end outside of the park. These permits differed significantly from concession contracts. Business permit operators did not enjoy the same privileges, terms, and conditions as park concessioners. Incidental business permits did not grant exclusive authority to provide services. Activities did not have to be necessary and if deemed appropriate in the park, no limit was placed on the number of permits issued. The National Park Service has not issued an incidental business permit for any activity that is inappropriate to the mission of Fort Sumter National Monument.

Monitoring of all commercial activities was essential to ensure that business operations were conducted in a safe, fair, and reputable manner consistent with the mission of the park. Monitoring was also essential to ensure compliance with conditions stated in the permit.

The National Park Service was authorized by the Cost Recovery Act to collect costs associated with incidental business permits. There were three elements to the determination of the dollar amount that could be charged: application, administrative, and monitoring costs. Application costs started with the request for the use of park resources and ended with mailing the application form. Administrative costs started when the completed application form was received and ended with the final signing of the permit. Monitoring costs started when the permittee arrived in the park to perform the permitted use and ended when the permitted use was over and the permittee left the area. Application and administrative costs could be determined using average costs derived from historic records, but monitoring costs had to reflect actual itemized costs.

The term of an incidental business permit could be for up to two years; one year was common. Incidental business permits were administered under 36 CFR 5.3, and did not come under the purview of the Concessions Policies Act. IBPs were issued noncompetitively. All business transactions, sales, and advertisements had to be conducted outside of the park. No facilities were authorized in the park in association with the business or operations. Operational terms and conditions were set as necessary to establish commercial use levels and to protect park resources. IBPs could not be issued for services permitted under concession authorizations when the concessioner was contractually granted the exclusive right to provide that service.

Under the new law IBPs will be replaced by Commercial Use Authorizations. The intent is still to provide a mechanism to authorize commercial uses of park resources that begin and end outside the park and virtually all the elements of IBPs will continue to be valid. The carrying capacity of the resource will be

the primary determining factor but the details of how the Park Service will control the number of commercial users has not been determined.

Other Authorizations

There are at least four other types of authorizations that could be considered as commercial but play a different role in park management. These authorizations include:

- Special use permits are issued for special gatherings. At times they are commercial in nature; for example, a special cultural event that lasts for one or a few days and includes the sale of ethnic foods or crafts (36 CFR 1.6 and NPS-53).
- Cooperating associations were authorized by Congress to support park interpretive and scientific activities through proceeds from sales of educational products and services. Cooperating associations are governed by a servicewide set of criteria and policies (NPS-32, soon to be DO-32).
- Utility rights-of-way and easements are land assignments for use of public land. Special use permits are used to describe a discrete term of use. In some cases uses can be commercial in nature, such as microwave or cell phone installations. They are reviewed to determine if they are appropriate and do not conflict with the park mission and resources (36 CFR, part 14 and NPS-53)
- Commercial filming permits are required for commercial filmmakers in a park. The permit stipulates where, when, and how the filming can be conducted (36 CFR 5.5 and NPS-21).

TABLE 1: TYPES OF COMMERCIAL AUTHORIZATIONS

DESCRIPTION OF ELEMENT	CONCESSIONS CONTRACT		CONCESSIONS PERMIT		INCIDENTAL BUSINESS PERMIT	COMMERCIAL USE AUTHORIZATIONS
	OLD	NEW	OLD	NEW		
Authority	79 Stat 969 16 USC 20	PL 105-391	79 Stat 969 16 USC 20	Short Form Concession Contract ¹	39 Stat 535 16 USC 3a	16 USC 1 36 CFR 5.3 Omnibus Park Management Act
Term	Up to 30 years	5 to 10 years ²	Up to 5 years	5 to 10 years	1 or 2 years	1 or 2 years
Solicited proposals	Yes	Yes	Yes	Yes	No	Yes, when #s are limited
Required services	Yes	Yes	No	Yes	No	No
Authorizes services	Yes	Yes	Yes	Yes	Yes	Yes
Services allowed	Yes	Yes	Yes	Yes	Yes	Yes
Construction allowed	Yes	Yes	Temporary only	No	No	No
Compensation for investment	Yes ³	Yes ⁴	No (policy)	No	No	No
Right of preference in renewal ⁵	Yes	Yes (Limited)	Yes	Yes (Limited)	No	No
Preferential right ⁶	Yes (by contract)	No	No	No	No	No
Assigned, amended, or extended	Yes	Yes	Yes	Yes	No	No
Assigned land or facilities	Yes	Yes	Yes	Yes	No	Yes, when #s limited
Fees	Franchise fee or Special Accounts	Franchise fee & Maintenance Reserve	Franchise fee	Franchise fee & Maintenance Reserve	Application, administration, and monitoring fees	Application, administration, and monitoring fees
Financial reports	Yes	Yes	Yes	Yes	Yes (limited)	Yes (reasonable fees)

1 Under the new law concession permits will be replaced with a short form concessions contract. The authority is the same as concessions contract.

2 In special cases where there are financial implications, such as large capital investments, the term can be extended to 20 years with approval from the director.

3 Possessory Interest

4 Leasehold Surrender Interest

5 Granted by law, not by contract or permit.

6 Applies to current/existing concessions contracts and may not apply to future/new concessions contracts.

THE PLAN

SCOPE

This plan provides goals and strategies for the protection of park resources and enhancement of visitor experience through the management of all commercial activities in the park including those authorized by concession contract, commercial use authorization, cooperative agreement, and permit.

MANAGEMENT GOALS

The following general goals for managing commercial activities at Fort Sumter National Monument are based on the NPS Organic Act, park authorizing legislation, the General Management Plan, and the park mission statement. Commercial operations in the park can assist the NPS in its mission by protecting important natural, cultural, and scenic resources, providing visitors with high quality and safe park experiences, and educating the public about the values and purposes for which the park was established.

- Only commercial activities deemed necessary and appropriate to achieve the park's mission, as determined by a logical process based on NPS policy, laws and regulations, available information, public input, and professional management experience will be allowed.
- Commercial activities in the park will provide goods and services that support and enhance public safety, enjoyment, and appreciation of the park.
- Commercial activity in the park will be managed at levels that prevent adverse effects on natural, cultural, and scenic resources and facilitate a high quality visitor experience.
- All commercial activities in the park will operate under contracts or authorizations according to specific terms and conditions. All applicable federal and state laws and NPS policies will be followed.

MANAGEMENT ACTIONS

Transportation from Liberty Square to Fort Sumter

Only one concession contract will provide this service for the NPS. The contract will require the concessioner to offer ferry transportation to the island every day except Christmas and New Years Day. The daily schedule will be determined by a survey conducted by an outside consultant but will probably fluctuate seasonally between 2 and 7 departure opportunities per day for the general public. Additional trips may be added to transport special groups, such as the Boy Scouts, special programming, or other planned events.

The current round trip takes about 2 1/2 hours with one hour spent at the fort. A longer time at the fort has been requested by about 25% of the visitors. The new transportation schedule will allow those who are interested to stay longer if desired and return on later ferry. This is contingent on meeting carrying capacity goals at the fort. The park will limit the amount and length of visitation as appropriate to protect cultural and natural resources.

The GMP recommends a ratio of 100 visitors per NPS ranger on the island. Visitation higher than that ratio limits the staff's ability to provide quality interpretive programs. Studies completed by Clemson University in the 1980's found that visitation greater than 385 at any one time unacceptably diminish the visitor experience. A new study will revisit this issue to assure resource protection is taken into consideration. The results will be published sometime in the next 3-5 years.

The Concessioner will operate a two-vessel fleet, however a three-vessel fleet is desired to provide a back up during vessel maintenance. All vessels used will be compatible with the 170-foot docks at the facility and the fort. All vessels will meet Coast Guard and accessibility requirements. Only minor maintenance of the vessels will be allowed at the docks. Major vessel maintenance, sewage pump out and fueling will occur elsewhere. The concessioner will be assigned government facilities at the docks and in the boat dock facility and will be required to maintain them. Space will be provided to sell tickets to the public. An on-site manager is required. All concessioner employees will wear uniforms. A more complete list of maintenance and operational requirements is

in Appendix A.

No commercial advertising other than the brochure for the Fort Sumter tour boat operation will be permitted. Partnership organizations such as the SC Aquarium and other associations may be able to provide rack cards if approved by the Superintendent. Advertising for other commercial activities such as carriage and harbor tours, dinner cruises, charters and/or fishing trips will not be allowed in any manner on the tour boats.

Smoking will be prohibited on tour boats and outer decks. A designated smoking area located outside of Fort Sumter and Liberty Square will be provided for the public.

No merchandise sales will be permitted on the tour boat or at the Monument. The concessioner is authorized to sell snacks and beverages on the boats but no alcoholic beverages will be permitted.

The concessioner will have a taped interpretive program that will be played when park ranger staff is unavailable to ride tour boats. A taped safety message will be played on every trip. Park management will approve both scripts.

Other Transportation Services

The National Park Service is currently formulating a national policy for commercial tour bus operations. When the policy is operational, tour bus companies would be required to follow the NPS policy that may require obtaining a Commercial Use Authorization.

The commercial use of the dock at Fort Moultrie would be conducted similar to the tour bus operation. Boats would be permitted to stop at the dock, unload passengers for a tour of Fort Moultrie and/or the surrounding natural areas and reload. The existing Corps of Engineers permit does not allow the origination of tours at the Fort Moultrie dock.

The National Park Service is planning an additional concession contract to provide a ferry from Patriots Point in Mount Pleasant and/or similar locations, to dock at the Liberty Square facility. However, Spirit Line Cruises, Inc. currently has a long-term exclusive contract to ferry passengers to and from the Patriots Point dock. If Spirit Line is unwilling to change this contract, NPS will request Patriots Point to provide the ferry service or seek an alternative dock such as at the Hilton Marina in Mt. Pleasant. Other public ferry systems will not be allowed to dock at the Fort Sumter facility unless it is associated with the visitor management goals of the park.

Merchandise Sales Throughout the Park

An agreement will be signed with Eastern National, a cooperating association, to sell limited merchandise in the park. No other sale of merchandise is authorized in the park or on the tour boats. Eastern National will provide interpretive materials and limited convenience items such as film from the tour boat facility sales area and the visitor center at Fort Moultrie. Beginning January 1, 2001 an interim operations will be provided until the opening of the tour boat facility. Alternatives being considered are extension of existing contract, contracting with a different provider and NPS providing ferry services. Eastern National will sell interpretive merchandise at the Fort Sumter until the new facility is opened.

Commercial activity is not authorized by the National Park Service at Liberty Square, the tour boat facility or on the grounds in front of the facility, the Aquarium or the restaurant on NPS lands. No commercial use authorizations will be issued for food, beverage, or merchandise sales from carts or permanent facilities. The South Carolina Aquarium will have one beverage and food cart to serve their immediate area with a light menu approved by the National Park Service. The South Carolina Aquarium patrons will have merchandise sales available in that facility or at the restaurants located nearby. The grounds of the facility are intended to provide a transition and contemplative experience. The area will also be used for interpretive activities and special events by the NPS and others under special use permit.

Advertising Throughout the Park

No commercial advertising other than the brochure for the Fort Sumter tour boat operation will be permitted on the tour boats, the tour boat facility, Liberty Square, Fort Moultrie, or Fort Sumter. Partnership organizations such as the South Carolina Aquarium, Patriots Point, and other associations may be able to provide rack cards if approved by the Superintendent. Advertising for other commercial activities such as carriage and harbor tours, dinner cruises, charters and/or fishing trips is not allowed in any manner in the park under 36 CFR. Advertising for activities conducted by the city, state, or other NPS partner organizations will be determined by the superintendent.

Special Events

The NPS will participate in special events within the City of Charleston. These events will be coordinated and/or permitted by special use permits issued under appropriate NPS regulations and policies in effect at the time of issuance.

Guide Services

Guide services within the forts and step on tour bus service will be required to obtain a Commercial Use Authorization.

Cooperating Association

Eastern National provides quality educational products and services to America's National Parks and other public trusts. Congress authorized cooperating associations in 1946. In 1948 Eastern National operated its first agencies. Eastern National is three-sided organization. It is an educational institution that functions as part of the interpretive arm of the National Park Service. It is a business that acquires or produces and sells cultural materials that enhance the enjoyment of visitors to the National Park System and it is a philanthropic foundation that disperses its net income directly and indirectly to the Service for its diverse programs.

Eastern National will operate at Fort Sumter National Monument through a Cooperating Association Agreement with the National Park Service. National Park Service approved publications, maps, videos, and theme-related merchandise will be offered at the dockside facility and Fort Moultrie visitor center daily. Eastern National staff will provide visitor information and carry out all financial and business aspects of the sales operation.

Commercial Filming

Commercial filming within the park will be permitted for fashion publications, commercials, documentaries, and an occasional major motion picture. According to Servicewide policy, these requests will be reviewed and evaluated individually to determine their level of appropriateness. Fees will be charged as appropriate to recoup costs of preparing the permit, staffing and maintenance.

Other Commercial Activity

Activities occur periodically in the park for which organizers charge a fee. Primarily interpretive in nature, some are conducted by for-profit entities and others by not-for-profit groups like elder hostel, schools, and environmental organizations. The law (36 CFR 5.3) states that these activities must have some written authorization (Commercial Use Permit, Special Use Permit, or a memo from the Superintendent). At a minimum the NPS will ensure these organizations have sufficient insurance for the activity. The NPS may charge a fee for the authorization or waive the fee at the discretion of the Superintendent.

REFERENCES CITED

National Park Service General Management Plan, Fort Sumter National Monument

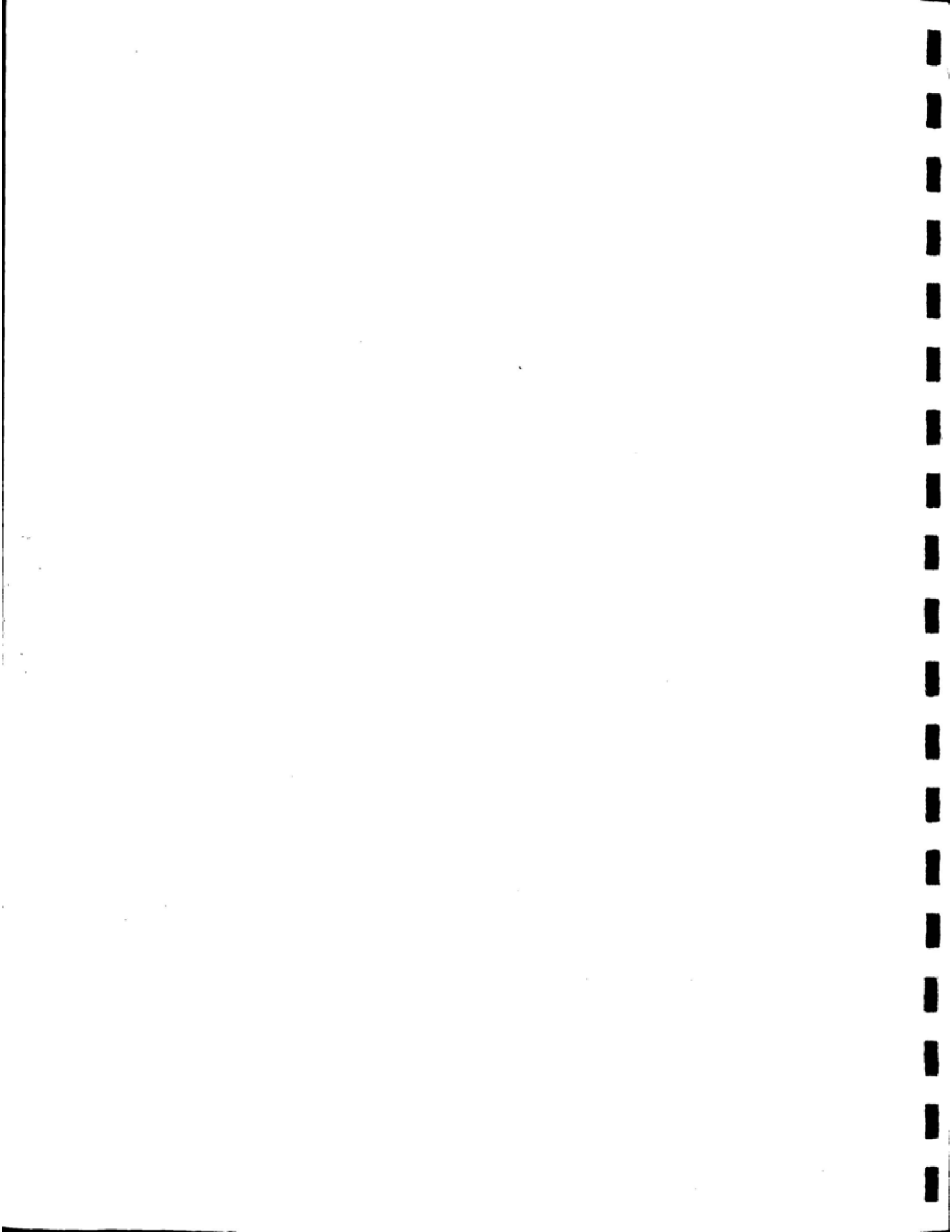
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APPENDIX A

FERRY OPERATIONS

The concession contract for the tour boat operating from the Liberty Square facility will contain the following requirements:

- Sell tickets and provide information.
- Operate and maintain the vessels and associated equipment (painting, electrical systems, gangways, etc.)
- Operate a two vessel fleet (three vessels would be better to provide a back-up vessel for repairs but the third vessel would have to be moored at another location, provided by the concessioner). Vessels must be suitable for operation and mooring at the NPS tour boat facility. The docking space is 170'6".
- Assignment of ticket sales, office, and storage space to the concessioner in the building (on-site concessioner management required).
- Maintenance of the dock and areas of the building assigned to the concessioner in accordance with an approved operating plan.
- Meet US Coast Guard regulations and requirements — vessels, restrooms, boarding apparatus, snack bar, and ticket sales area.
- Maintain vessel trip schedule as required by the NPS with the goal of providing the visitor with greater flexibility in their length of stay at the fort such as varying tour lengths offered at times clearly specified.
- Number of passengers per trip to be determined by the NPS. This relates to carrying capacity at the fort.
- No smoking is permitted on the vessels, including outside decks.
- Provide a snack bar on the vessel with limited menu to be determined by the NPS.
- Alcoholic beverage sales are prohibited on the vessels.
- No concessioner merchandise sales on the vessels, at the forts, or in the tour boat facility.
- Require a dress code/uniforms for employees.
- Provide training to all employees on the purpose and significance of Fort Sumter and in providing general information to visitors about Charleston.
- Only vessels providing contract authorized services or support for services are allowed at the dock. No other boat activity such as dinner cruise, harbor tours, party boats, operated by the concessioner will impact the tour operation (such as setting up, removing chairs, minor repairs, tying up boats for such trips, etc.)
- Meet all state, federal, and NPS liability insurance requirements.
- Meet existing Coast Guard standards and dock operation limits (min/max length, draft, min/max number of seats for passengers, power/speed, number of engines, age of vessel - safety standards, radar, emergency communications, emergency power source, ability to communicate with NPS radio frequencies, ability to dial 911, etc.)
- Comply with all Corps of Engineers permit requirements.
- Provide a Loss Control Plan (procedures for dealing with environmental accidents such as a fuel spill) that meets NPS standards.
- Provide a Health and Safety as well as Emergency Response plan (procedures for dealing with environmental accidents, training, protecting human health, and limiting damage to natural resources such as a fuel spill, handling visitor accidents and emergencies) that meets NPS standards.
- Meet A and B level sewage disposal standards (see standard contract language) with no off loading sewage at the dock and only in South Carolina Department of Health and Environmental Control approved facilities.
- Major vessel maintenance and fueling not to occur at the dock. This includes but is not limited to moving engines on and off the vessels, removing parts from engines, recarpeting vessels. Minor maintenance that may occur at the dock includes items such as touch up painting, washing seats, cleaning snack bar, emptying trash, replacing a single table or group of 7 chairs.
- Provide a quality audio system on board for the ranger and tape/ CD for tour and safety message. Messages must be audible to all visitor spaces including restrooms and must be clear and easily heard.
- Provide transformer, wiring for any electrical needed by the tour boats at the pier.
- Provide trash removal for all NPS operations (Fort Sumter and Liberty Square facility).

- Provide NPS 3 parking spaces in the city parking garage at Calhoun and Concord Street.
- Provide public notice of tour times, location of departure point.
- Gangways will not be stored on the NPS dock.
- Vessels should contain a designated space for the ranger when on board so that they can be seen and heard by a majority of the visitors.

Until the tour boat facility is operational, the contract will contain the following interim requirements:

- Sell tickets and provide information.
- Operate a two vessel fleet (three vessels would be better to provide a back-up vessel for repairs).
- Meet ADA requirements — vessels, restrooms, boarding apparatus, and snack bar.
- Maintain vessel trip schedule as required by the NPS.
- Provide a Snack Bar on the vessel with limited menu to be determined by the NPS.
- Prohibit alcoholic beverage sales on the vessels.
- Require a dress code/uniforms for employees and training to provide general information to visitors.
- Meet all state, federal, and NPS liability insurance requirements.
- Meet existing Coast Guard standards and dock operation limits (min/max length, draft, min/max number of seats for passengers, power/speed, number of engines, age of vessel - safety standards, radar, emergency communications with emergency power source, ability to communicate with NPS radio frequencies, etc.)
- Provide a Loss Control Plan (procedures for dealing with environmental accidents such as a fuel spill) that meets NPS standards.
- Meet A and B level sewage disposal standards.
- Will not operate a sales facility at FOSU or aboard the vessels.

APPENDIX B

PUBLIC INPUT

The Commercial Services Plan invited public input and comment. Their input assisted the NPS with assuring safety, visual quality at the new facility, logistical concerns with capacity and compliance with ADA and Coast Guard regulations. The comments and question along with answers to the concerns are as follows:

1. No tours other than Fort Sumter tours should be allowed to depart from the docking facility in Charleston. This gives an advantage to the tour operator.

The National Park Service agrees with this comment. The current permit from the COE will allow only NPS concessioner operated vessels with licensed captains and the NPS vessel to depart from the new NPS pier in Charleston. The use of the NPS pier by the concessioner or other private tour company not related directly to the NPS operation would be inappropriate.

2. Advertisements should be for the ferry to Fort Sumter. Tours of the harbor in the advertisement are inappropriate, as the ferry should concentrate on transportation to the fort. Concession brochure attached.

The National Park Service agrees with this comment. Under the current contract, the concessioner has been allowed to include other non-concession-operated tours to be advertised along with the authorized NPS tour. NPS believes this action by itself does not officially endorse other non-concession tours but does give the appearance of NPS endorsement. Therefore, under the new contract, the concessioner will not be permitted to advertise any commercial operations not related to the NPS concession program or not related to the mission of the NPS.

3. Concessioner should not have the opportunity to advertise other operations not related to the concession program or trips to Fort Sumter.

See Number 3.

4. Signage at the vessel departure area should not be excessive and should be limited to finding the vessel location.

The NPS agrees that signage at the NPS pier should not be excessive. NPS is developing a sign and a wayside exhibit plan for this purpose. NPS wishes to provide sufficient information on site to ensure all visitors can reach their desired destinations without difficulty. The wayside exhibit program will provide additional interpretive information about the harbor and the major site visible from the visitor center deck.

5. No combination or discount tickets in connection with the Aquarium should be offered. This would provide an unfair advantage to other ferry operations.

NPS has considered using combination tickets with the Aquarium and Patriots Point. No agreements have been reached. However, if the NPS finds that combination tickets are in the best interest of the park visitor management goals and the goals of other associated sites such as the Aquarium and Patriots Point, the Service will seek to use this option.

6. Comparisons of the Fort Sumter ferry service should not be compared with simple ferry operations when doing price comparable. With interpretation, the ferry service will be much more than a simple ferry.

The NPS agrees that the ferry ride to Fort Sumter is a significant part of the visitor experience. The Fort Sumter visitor experience will begin at the tour boat facility in Charleston. The ferryboat is a vital link in the interpretive effort. For comparability reviews, the NPS considers ferry capacity, the length of tour, type of interpretation, and the type of ferry service.

7. Merchandise sales at dockside should be operated by the concessioner. The present contract envisioned this relocation and it should not be deprived from the concessioner.

The NPS has decided that Eastern National, a congressionally authorized non-profit organization, will provide necessary sales to support the park's interpretive program goals. The atmosphere within the dock visitor center is meant to be contemplative with exhibits and artifacts. Concessioner sales have wide latitude for sale item selection. By using the cooperating association, NPS can reduce the amount of time to supervise the sales operation and maintain a more focused merchandise program directed solely to the support of the park interpretive goals. The existing 15-year concession contract expiring on 31 December has no influence on the current needs of the NPS to provide the highest quality visitor experience.

8. Fort Sumter Tours disagrees that the cost to visit Fort Sumter is relative high.

NPS based its calculations on the cost for a family of four with two teenagers to visit the fort. The current cost would be \$44.00. With the limited visitor experience available prior to reaching the fort, only the stay at Fort Sumter is considered in the calculation. Given the stay is likewise limited to one hour, the cost to visit Fort Sumter is 44.00 per hour for a family of four. Many sites charge more, however the visitor time is not limited to only one hour.

9. The third comments suggest that visitation to Fort Sumter is acceptable at the level of 385 since only 5.1% of visitors surveyed in 1986 said the visitation was excessive.

The NPS points out that the survey conducted in 1986 by Clemson University studied the visitor's perception associated with visitor use levels at Fort Sumter. The study did not review the condition of the fort or the damage to the fort that may be caused by the current visitor loading. The NPS proposes to complete a resource-related study in the near future. The NPS believes that resource preservation could be the real limiting factor in total numbers of visitors allowed in the fort as well as the maximum number of visitors allowed at any given time.

10. Is there any real basis for believing that a substantial portion of visitors desire to remain at Fort Sumter more than one hour?

The NPS completed a study in 1996 in which 81% of the visitors surveyed either favored or strongly favored a ferry system that provides more flexibility in their length of stay at the fort.

11. Some passengers expect the availability of alcoholic beverages.

The use of beer is not a significant part of the business in the current concession program. After experimenting with the availability of beer during the trip to Fort Sumter, the NPS believes this service is not warranted nor needed in the concession program expected after 2000.

12. If merchandise sales are to continue, the concessioner should be allowed to provide the service.

See question 1.

13. Will the 200 feet of space required for the dock at the tour boat facility conflict with the proposed construction of a private dock next door?

The NPS has constructed a pier that is 170' 8" in length. To the north of this pier, a mooring dolphin will be constructed. This will provide approximately 200 feet of space for the anchorage of boats at the NPS pier. The Service does not envision that the concessioner service being conducted from the tour boat terminal will adversely affect ferry operations from the adjacent dock during park operating hours.

14. Since tour boats are not normally heated and cooled, the requirement to offer such service by the concessioner should be reconsidered.

The NPS agrees not to require the concessioner boats to be heated and cooled in the required elements of the ferry operation. However, the Service will include this item in the list of optional services that would be considered as an incentive for the concession contract.

15. Will the concessioner be expected to pay for and maintain any wiring for electrical needs by the tour boats at the NPS pier?

During the design phase for the current pier, the NPS learned of the many different electrical systems used on ferry vessels. When the dock was designed, the current concessioner had different electrical systems for each of the three vessels used to ferry visitors to Fort Sumter. To make this item equal to all potential concessioners, the Service concluded that the concessioner would be required to pull wires and install the transformer that would service the ferry boats provided. To facilitate this construction, NPS has installed conduit and transformer pads at the new dock. Additionally, should the concessioner choose to install telephone or other electronic communication devices for the boats, conduits have been constructed for these utilities as well.

16. For more than 39 years, Fort Sumter Tours has stored gangways on the Fort Sumter dock. Is this practice to be discontinued? Storing gangways was not well defined.

The NPS has been required to manage gangways under the existing contract. Often as many as four gangways are located on the Fort Sumter pier. These gangways are handled in such ways that dock railings are damaged, visitor access is impeded and potential hazards are created. NPS will work with the concessioner to define a gangway system that requires fewer units and will increase the ease of loading of passengers under the NPS accessibility program.

A single power operated gangway that could be used by each concessioner vessel would be optimal. NPS has reviewed Accessible Water Transportation, A Project ACTION Best Practices Study, produced by Katherine McGuinness and Associates, A Division of TAMS Consultants, Inc. The researchers that prepared this document reviewed several water transportation operations to determine the best practices in the industry.

17. The current concession vessels have USCG approved sewage disposal systems. Shouldn't this be adequate in lieu of the A and B level disposal required?

The NPS does not wish to add pollutants to Charleston Harbor. However, the NPS agrees with the statement that USCG approved sewage disposal systems standards should be required by the NPS for minimum sewage treatment and discharge. However, the NPS will include in the optional concessioner requirements treatment systems that processes the A and B level disposal systems. As a means of operation, ferryboats with minimum treatment capabilities will not be allowed to pump treated effluent into the harbor within 500 yards of either NPS dock or other structure along the water's edge.

18. The NPS should reconsider its prohibition against off loading sewage at its dock and provide a sewage pump out facility. No commercial facilities are available that could handle the volume expected on the ferryboat. If this is not changed, it will require the concessioner to treat sewage on board and dump.

The NPS has considered the question of providing a sewage pump station at the dock. Given the expected volume of visitors to the NPS facility, the South Carolina Aquarium, and the adjacent restaurant, handling sewage at the dock does not seem to be a responsible action. Therefore, the Service will require

the concessioner boats to off load sewage at an alternate location such as the maritime center.

19. The prohibition against completing major maintenance at the dock for the boats was questioned. The decision could require excess operating cost and delays in ferry schedule.

With the anticipated visitation to the NPS pier in Charleston, the ability of the concessioner to conduct significant maintenance actions while moored at the dock will be severely limited. Actions that take place out of visitor sight and hearing will be permitted at the dock. Actions that do not result in staining the concrete deck will be considered. However, actions such as leaving vehicles parked on the dock, the removal of engine parts, leaking equipment or other actions that would potentially harm the visitor experience will not be permitted. Cleaning and maintenance actions that may result in contaminants migrating into the Cooper River will not be permitted. Deliveries to the boat must be made prior to normal operating hours. During the operating hours, no equipment of maintenance functions will be allowed on the dock. General cleanup, janitorial services and training may be completed during normal operations when the ferry is not in service.

20. A visitor called to express his desire that visitors be allowed to board the Fort Sumter tour boats at Patriots Point.

The visitor experience will begin at the new facility in Charleston. Once the visitor enters Liberty Park the transition from the hectic pace of 21st century life will begin, as will the NPS interpretive effort. As the visitor walks through the park from Concord Street or along the promenade, wayside exhibits will be available. Once the visitor has purchase a ticket, they will enter into a contemplative exhibit area that will set the stage for their visit to Fort Sumter. The first exhibit encountered will be a heroic Fort Sumter scene reaching from the floor up more than 24 feet to the ceiling. To the left of this large graphic, a full size replica of the garrison flag will be hung from the ceiling. This original garrison flag flew over Fort Sumter until the day before the Civil War began when it ripped into just as the nation was preparing to be torn apart. Below this reproduction will be the original flag carefully preserved and sealed in an exhibit case with differing parts of the flag visible each day. Exhibit islands will help set the time and place for the visitor to understand the coming War. As the visitor exits the exhibit area, wayside panels will help identify significant features in the harbor such as shipping; USS Yorktown, Cooper River Bridges, and Fort Sumter located just three miles out in the harbor.

Visiting Fort Sumter will become much more than a ride on the ferry boats. Rangers will accompany the visitors to Fort Sumter on the tour boat to answer questions and highlight points of interest in the harbor related to Fort Sumter and Charleston's Civil War history. Upon arrival at the Fort the ranger will accompany the visitor into the fort to assist them in understanding the park story.

The NPS wishes to continue serving Mt. Pleasant and Patriots Point while maintaining the visitor experience quality. To accomplish this effort, NPS hopes to broker a solution with Mt. Pleasant and Patriots Point to provide ferry service between Mt. Pleasant and Charleston. Departures could occur at Patriots Point and terminate at the Maritime center as an example of one solution. By working with Patriots Point, Charleston Aquarium, Mt. Pleasant, and Charleston, the best possible visitor experience will be available for the thousands of additional visitors deciding to make the lowcountry a vacation destination.

21. In regard to ADA, USCG rules and ADA requirements often conflict. NPS and Concessioner should work together to resolve the gangway system.

The NPS concurs that the concessioner and the Service should work together to resolve issues related to accessibility. This means the NPS not only has to be concerned with enabling people with disabilities to have access to parks and facilities but, once there, the NPS also needs to do everything feasible to enable them to receive as close to the same benefits as those received by other visitors. This also means the Service obligation extends to individuals with visual impairments, hearing impairments, and cognitive impairments, as well as those with mobility impairments.

One primary tenet of disability rights requirements is that, to the highest degree reasonable, people with disabilities should be able to participate in the same programs and activities available to everyone else. In choosing among methods for providing accessibility, priority will be given to those methods that offer programs and activities in the most integrated setting appropriate. Special, separate, or alternative facilities, programs, or services will be provided only when existing ones cannot practicably be made accessible. The determination of what is reasonable will be made only after careful consultation with persons with disabilities or their representatives.

22. Dock height at new dock should be same as at Fort Sumter.

The new pier in Charleston and the Fort Sumter pier were constructed at 10 feet above Mid Level Waterline.

23. How will the visitor capacity at the Fort Sumter ruins affect the passenger capacity of concessioner vessels?

The carrying capacity at Fort Sumter will be set at a maximum number of visitors allowed in the fort at any one time. Please see answer to question number 3, Fort Sumter Tours, Inc. The concessioner will be expected to ferry sufficient numbers of visitors to carry the average visitation to Fort Sumter during peak months with a 30% increase for the increase in demand expected over the next 10 years. Should boat capacity exceed the maximum capacity for the fort, the boat capacity would be limited by the capacity of the fort. The current average peak visitation per boat is 261 for July. By adding 30%, the minimum concessioner boat capacity should be 339. The concessioner will be expected to operate the ferry if ten visitors are available for the trip.

24. Do Concessioner vessels need to carry a capacity equal to the maximum allowed for the Fort?

See the discussion above. The maximum size will be determined by the available mooring space at the NPS pier in Charleston and at Fort Sumter, and the reasonableness of the boat to meet the minimum needs of the visitor and the Fort Sumter concession program. No ferry should be longer than 105 feet.

25. Alternative language for meeting ADA should be wheelchair accessible.

See question number 1.

26. The installation of permanent adjustable ramps would be a long-term asset for the NPS and the concessioner.

The NPS concurs that the installation of permanent adjustable gangways would be of benefit to the NPS and the concessioner. At this time, the NPS has not identified a system to satisfy this requirement. However, the NPS expects the concessioner to be a willing participant in developing and the funding this new gangway system.

27. Patriots Point submitted a lengthy paper explaining their position and why in a purely business context it would make little sense for the NPS to discontinue its tour departures from Patriots Point.

The NPS goal with the construction of the new facilities in Charleston is to provide the best possible visitor experience. It is the policy of the NPS to put the visitor experience above the profit because National Park Service sites are America's treasures.

28. The NPS failed to approach Patriots Point regarding the decision to relocate tour boats.

The National Park Service completed the General Management Plan for Fort Sumter National Monument in 1998. Within this document, it clearly states the NPS goal to have all visitors receive the same experience by departing from a central facility in Charleston. The NPS did not enter into the decision to relocate ferry service to a single point without public input. The long-range planning document for the NPS is the general management plan (GMP). The NPS began this planning process at Fort Sumter in December 1994 with a management objectives workshop attended by some thirty representative of cooperating agencies including Patriots Point. The first public workshop for the GMP was held on 10 August 1995 after a flyer was mailed to all interested parties announcing the issues and calling for participation. An alternatives document was issued for public review in March 1996. A second public workshop was held on May 13, 1998 for the final GMP. The public review period for the General Management Plan closed on 29 May 1998. Announcements and letters of invitation to participate were issued and a Legal notice of the meeting appeared in the Post and Courier on May 4, 5, and 6. A Finding of No Significant Impact was issued on June 25, 1998.

29. The NPS will lose significant commission revenues generated by the visitors to Fort Sumter from Patriots Point.

The NPS does not anticipate losing any revenues or having reduced visitation when the new facility is opened. To expect no visitor who currently uses the Patriots Point departure location to use the new NPS facilities is incorrect. With the completion of the Liberty Square, the visitor center, and the installation of high quality professionally prepared exhibits and major artifacts from the Fort Sumter collection, the new tour boat facility will in itself be a significant attraction in the lowcountry. The Service expects visitation to increase. Visitors who would have departed from Patriots Point will depart from the new facility in Charleston. Additionally, 1,000,000 visitors will arrive at the new NPS facilities to visit the South Carolina Aquarium. These visitors as well as the additional visitors attracted by the Service's efforts to announce its new facilities will form a large pool of potential visitors to Fort Sumter and other area attractions. Patriots Point can participate in this effort by working with the Service to provide quick and easy transportation between Patriots Point and the new NPS dock.

30. The NPS will lose valuable flexibility by consolidating tour boat operations into a single site.

The NPS has experience in operating a single tourboat departure site. Until 1985, the Charleston Marina was the only location to provide service to Fort Sumter. Visitors had the opportunity to stay a second hour since the next boat returned to the same location. Additionally, the added burden of providing additional staff and operating expense in an attempt to provide similar visitor experience at Patriots Point would at best remain much less than the experience from the new NPS facilities in Charleston. By trying to duplicate facilities, it would create an undue burden on the taxpayer. By leaving from one departure site, one facility would provide an exceptional visitor experience and added flexibility in detailing schedules to the fort.

31. The town of Mt. Pleasant will lose thousands of dollars in local option sales tax revenues benefited by visitors to Fort Sumter from the Patriots Point facility who no longer will be able to visit Fort Sumter from Mt. Pleasant.

The NPS believes that assuming no visitors will enter the town of Mt. Pleasant to avail themselves of motels, restaurants, and shopping opportunities is not accurate. Many NPS visitors currently stay in Mt. Pleasant where rooms are available and often less expensive. This is particularly true during the summer when families are looking for convenient locations near the beaches while visiting cultural attractions. By participating in the joint visitor use management with the NPS and Charleston, additional visitors could easily stay in Mt. Pleasant, visit Fort Sumter, eat dinner in either town, and shop on King Street or in the new Town Center.

32. Mt. Pleasant businesses such as hotels will lose hundreds of thousands of dollars of spin off revenues generated by Fort Sumter visitors.

See answer number 5.

33. Patriots Point Development Authority will lose direct revenues.

The NPS does not agree with this outlook. If Patriots Point does nothing to assist the NPS and the City of Charleston in visitor management, Patriots Point will likely lose revenues. However, if Patriots Point and Mt. Pleasant and Charleston are willing to take an active role in managing the new visitors to the lowcountry, then all will benefit greatly. With expanded public transportation, a water taxi or other means to rapidly and conveniently communicate between Patriots Point and the Fort Sumter facilities, improved transportation between hotels, restaurants and the visitor, the resident, and the attractions will all benefit. Fewer visitor cars will cram onto the limited streets of Mt. Pleasant and Charleston; hotels will be readily accessible, as will restaurants in both communities. The revenues of Patriots Point will increase.

34. The NPS decision comes at a time when the number of visitors to Fort Sumter from Patriots Point is growing faster than ever while city visitation is declining.

The NPS agrees with this statement. However, the statement taken out of context is misleading. Visitation has been discouraged by the NPS to the Marina for some years. Hurricane Hugo destroyed most of the marina and flooded it with sediments. For several years, the concessioner boats were moored on the outside of the breaker wall in the Ashley River making it difficult for older visitors to reach the boats. Road improvements along Calhoun Street and Street hampered visitor access for over five years. With new management at the Marina, much of the parking was eliminated by reserved spaces for boats and trailers. Additionally, special boat shows were held in the Marina parking area almost totaling excluding the Fort Sumter visitor. Even with all these problems, visitation in the City remains near 50%.

35. Patriots Point is the recognized as the number one paid attraction in the state of SC.

The NPS recognizes that Patriots Point is the number attraction in paid attendance within the state of South Carolina. Fort Sumter is listed as one of the 25 most important cultural sites in America. The South Carolina Aquarium is likely to become the attraction with the largest paid attendance. However, none of this has anything to do with the commercial service's plan.

36. Participants in the Boy Scout program will no longer be able to visit Fort Sumter.

The NPS does not agree with this statement. Boy Scouts will continue to be welcomed to visit Fort Sumter and we would encourage Patriots Point to allow more time for this activity. It would be unfortunate if the Scouts did not have a chance to see the garrison flag that flew over Fort Sumter and the other exhibits in the new visitor center as well. NPS wishes to assist Patriots Point in continuing their Scout program and providing an opportunity to visit Fort Sumter. However, the NPS has concerns regarding the exclusive contract Spiritline Cruises has with Patriots Point. This contract prevents any other ferry company from embarking passengers from the Patriots Point dock.

37. The NPS, Aquarium, and restaurant will be built on 4.15-acre site in Charleston.

This statement is partially true. The NPS site contains 8.19 acres with 4.15 acres in highland. Liberty Square will cover most of this highland area. All the NPS building and 70% of the Aquarium building are built over water.

38. A traffic nightmare will be caused by the congestion at the new NPS facility.

Adequate planning has taken place to ensure Concord and Calhoun Streets do not become a nightmare. Good signage is planned along with significant improvements in public transportation, as well as street improvements to ensure an orderly flow of visitors.

39. Visitor's will pay to park at the new facility and parking is free at Patriots Point.

Visitors to the new facility will pay to park, as do visitors departing from the City marina and visiting other attractions in Charleston. Parking has become a valuable source of revenue for municipalities. With the developments planned at Patriots Point in the near future, parking will become more and more congested. It is unlikely that visitors to Patriots Point will continue to enjoy free parking for any appreciable length of time. The revenue stream is just too good.

Appendix C

ASSESSMENT OF THE REGIONAL IMPACTS ASSOCIATED WITH THE CONSOLIDATION OF FORT SUMTER DEPARTURE POINTS

EXECUTIVE SUMMARY

The National Park Service (NPS) asked Industrial Economics, Inc. (IEc) to assess the economic impacts to the Charleston, SC region that may result from changes in Fort Sumter tour boat operations. Currently, visitors to the Fort depart from one of two locations, the City Marina in Charleston, or Patriots Point in Mount Pleasant, SC. Beginning in the summer of 2001, all departures will take place from a pier located adjacent to the new Fort Sumter Visitors Center near the Aquarium in downtown Charleston.

Specifically, the NPS asked IEc to consider:

- How visitation to the Fort will change given the new departure location;
- Whether Fort visitors would benefit from the option to spend more time at the Fort;
- Whether Fort visitors would take advantage of a proposed water taxi service from Mount Pleasant to downtown Charleston;
- The financial impact on Patriots Point of the change in the departure point to Fort Sumter; and
- The expected impact on Mount Pleasant's economy from a change in the Fort Sumter departure point.

To complete this assignment, IEc developed and administered three surveys of Charleston area visitors and residents. The results of these surveys define current patterns in visitation and the potential changes that will result after the new Fort Sumter Visitors Center opens next year.

The New Visitor's Center will significantly increase visitation to the Fort.

- The new Fort Sumter Visitors Center will have greater exposure to Charleston area visitors, resulting in a significant increase in visitation to the Fort. This gain in visitation will more than offset the loss in visitors who prefer the current departure options. Specifically:

The S.C. Aquarium is projected to attract between 500,000 and 700,000 visitors this year. Had the new Fort Sumter Visitors Center been open, we estimate that *at least* eight to 10 percent of Aquarium visitors would have visited the Fort. This would lead to an increase in Fort Visitation of about 36,500 to 45,600 visits per year. Note that these are visitors *who had not planned to visit the Fort given the current departure points*.

Only nine percent of current Fort Sumter visitors (or approximately 20,600 visitors) would *not* have visited the Fort had the new departure site at the SC Aquarium been the only available access point.

Thus, the Fort will be able to serve *at least* seven to 10 percent more visitors, given a single departure point at the new Visitors Center. This represents 15,900 to 25,000 visitors per year on top of the current visitation of approximately 240,000 per year.

The Fort would also serve approximately 29,000 additional visitors per year who are interested in seeing the Visitors Center but do not have the time to visit the Fort.

- The estimate of visitation gain that the Fort will experience is conservative (i.e., more likely to understate the gain in visitation than overstate it) for several reasons. The estimate does not reflect Aquarium visitors who expressed interest in going to the Fort, but not exploring the Visitors Center. In addition, a significant number of visitors who did not plan to visit the Fort expressed interest going to the Visitors Center, but not riding the boat to the Fort. It is unknown what percent of these tourists would opt to go to the Fort in response to the Visitors Center. Lastly, the estimate only reflects visitation decisions among Charleston area tourists who are staying overnight for at least two nights

Visitors want to spend more time at the Fort. The new departure point will provide visitors with increased flexibility in the length of their stay.

- One-third of Fort visitors, or nearly 75,000 visitors, would prefer to have more time at the Fort, with the majority of these individuals preferring at least an additional half-hour. Through consolidation of the departure points, Fort visitors will have a variety of return departure options, allowing for shorter or longer stays at the Fort.

One-Third of Fort Sumter and SC Aquarium visitors would use a Water Taxi between Mount Pleasant and Charleston

- Among both Fort Sumter visitors and SC Aquarium visitors, approximately one-third would definitely use or most likely use a taxi service that ran between Mount Pleasant and downtown Charleston. Willingness to use a water taxi service is only slightly higher among visitors staying in Mount Pleasant when compared to those staying in downtown Charleston.

Patriots Point will experience some loss in gross revenues, but this loss could be significantly offset given water taxi service from Charleston to Patriots Point

- Our research indicates that Patriots Point may see a reduction of between two and twelve percent of its annual gross revenues when the departure point for Fort Sumter moves to downtown Charleston. Note that this is a change in total revenues, not net income to this operation.
- This revenue loss is nearly all related to a change in incidental food and gift sales by area tourists who are at Patriots Point primarily because of the Fort Sumter departure point. Only 31 percent of Fort Sumter visitors also went to the Maritime Museum on their trip to Patriots Point. The majority of Fort visitors chose to combine Fort visit with a Charleston area attraction other than the Maritime Museum on that day.
- This revenue loss could be significantly offset by offering a water taxi service that operated between Patriots Point and the Fort Sumter Visitor Center. The tourist traffic due to a water taxi would increase Patriots Points visibility to Charleston area visitors who did not plan on visiting the Yorktown.

We expect little impact on Mount Pleasant's economy as a result of the change in Fort Sumter departure point.

- We considered the extent to which Charleston area visitors would change their lodging location given the change in the departure point to Fort Sumter.
- Lodging choice by Charleston area visitors is driven by the cost of the room and the ease of getting to a variety of attractions in the Charleston area.

- We found no difference in the lodging choice of visitors to the SC.Aquarium who did not plan to visit Fort Sumter and visitors to Fort Sumter.

